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December 21, 2001

Via Certified Mail and e-mail

Christine Todd Whitman, Administrator  
U.S. Environmental Protection Agency (EPA)  
P.O. Box 1473  
Merrifield, VA 22116

Re: Brominated Flame Retardant Industry Panel (BFRIP),  
HPV Chemical Challenge Program Submission,  
Test Plans and Data for Cyclododecane, 1,2,5,6,9,10-hexabromo- (CAS  
No. 319-455-6) and Phenol, 4,4-isopropylidenebis(2,6-dibromo-) (sic)  
(CAS No. 79-94-7)

Dear Administrator Whitman:

The BFRIP of the American Chemistry Council is pleased to submit the attached data assessment for Cyclododecane, 1,2,5,6,9,10-hexabromo- (CAS No. 319-455-6) and Phenol, 4,4-isopropylidenebis(2,6-dibromo-) (sic) (CAS No. 79-94-7) to EPA's HPV Chemical Challenge Program (Program). This submission fulfills BFRIP's commitment to the Program for the year 2001. Data for two additional chemicals will be submitted in time to meet our commitment for 2003. BFRIP member companies are Albemarle Corp., Great Lakes Chemical Corp. and Ameribrom, Inc., a subsidiary of Bromine Compounds Ltd.

In addition to the test plans and data summaries for (CAS No. 319-455-6) and (CAS No. 79-94-7), please also find a set of robust summaries contained in EPA's HPV format document for both of these chemicals.

This submission is also being sent electronically to the following e-mail addresses:

[Oppt.ncic@epa.gov](mailto:Oppt.ncic@epa.gov)  
[Chem.rtk@epa.gov](mailto:Chem.rtk@epa.gov)

In preparing this test plan, the Panel has given careful consideration to the principles contained in the letter EPA sent to all Program participants on October 14, 1999. As requested by EPA in that letter, the Panel has sought to maximize the use of scientifically appropriate categories of related chemicals and of structure activity relationships.



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Admin. Christine Todd Whitman  
December 21, 2001  
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If you require additional information, please contact the BFRIP's technical contact, Wendy K. Sherman at (703) 741-5639 or [wendy\\_sherman@americanchemistry.com](mailto:wendy_sherman@americanchemistry.com).

Sincerely yours,

Courtney M. Price  
Vice President, CHEMSTAR

Attachments

cc: C. Auer, EPA/OPPT  
B. Leczynski, EPA/OPPT  
BFRIP Members  
Steve Russell, ACC (without attachments)